

BSG:evg

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

CLERK'S OFFICE
AT BALTIMORE

UNITED STATES OF AMERICA

v.

TODD PATRICK WILLASCH
Defendant

* BY DEPUTY
* CRIMINAL NO. WOQ-09-0567
* (Sexual Exploitation of a Minor for the
* Purpose of Producing Child
* Pornography, 18 U.S.C. § 2251(a),
* Forfeiture)

INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

In on or about the Spring and Summer of 2008, in the District of Maryland, the defendant,

TODD PATRICK WILLASCH,

did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction had been produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant produced visual depictions of a minor engaged in sexually explicit conduct, including, but not limited to, an image of prepubescent child lasciviously exposing her genital area.

18 U.S.C. § 2251(a)

FORFEITURE ALLEGATIONS

As a result of the offense set forth in Count One, the defendant,

TODD PATRICK WILLASCH,

shall forfeit to the United States his interest in all property, real and personal, (1) that was used, or intended to be used, to commit or to promote the commission of the offense in Count One, and any property traceable to such property, or (2) that constitutes or traceable to gross profits or other proceeds obtained, directly or indirectly, as a result of the offense in Count One, including but not limited to 14580 Fox Chase Circle, Ridgely, Maryland.

SUBSTITUTE ASSETS

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code Section 853(p) to seek forfeiture of any other property of the defendant up to the value of the property charged with forfeiture above.



ROD J. ROSENSTEIN
UNITED STATES ATTORNEY

A TRUE BILL:

11/4/09
Date

SIGNATURE REDACTED